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E-filed 2/8/08

7 Attorneys for Defendant
8 HEWLETT-PACKARD COMPANY

9
10 UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 JACKIE BLENNIS and DAVID BRICKNER,
14 individually and on behalf of all others similarly
15 situated,

16 Plaintiffs,

17 v.

18 HEWLETT-PACKARD COMPANY, a
19 California Corporation; and DOES 1 through
20 250, inclusive,

21 Defendants.

CASE NO. C 07 00333-JF

**JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINE TO
HOLD ADR SESSION; SUPPORTING
DECLARATIONS OF ALFREDO
TORRIJOS AND MICHAEL H. DORE**

[N.D. Cal. Local Rule 6-1(b) & 6-2]

1 **JOINT STIPULATION**

2 WHEREAS Plaintiffs Jackie Blennis and David Brickner ("Plaintiffs") commenced this
3 action by filing a Complaint on January 17, 2007, and serving the Complaint on Defendant Hewlett-
4 Packard Company ("Defendant") on May 1, 2007;

5 WHEREAS on August 20, 2007, the Court (Judge Ronald Whyte presiding) set the deadline
6 for the parties to hold an ADR session at 180 days from the date of his August 20, 2007 order, that is,
7 February 16, 2008;

8 WHEREAS on January 14, 2008, the Court granted the parties' stipulated request to continue
9 the case management conference in this matter until March 14, 2008 at 10:30 a.m.; and

10 WHEREAS good cause exists for approving this Joint Stipulation in light of the procedural
11 posture of this and related cases pending in this Court in which HP is a defendant.

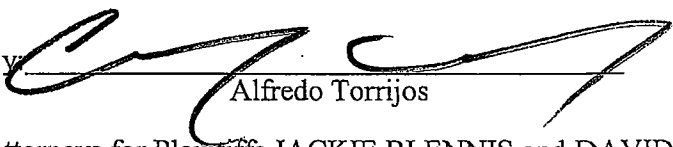
12 ACCORDINGLY, pursuant to Local Rule 6-1(b), the parties, by and through their counsel of
13 record, hereby stipulate to, and request the Court's approval of the following:

- 14 • The parties agree that the existing deadline for the parties to hold the ADR session shall
15 be moved from February 16, 2008, to **May 16, 2008**.

16 **IT IS SO STIPULATED.**

17
18 DATED: February 2, 2008

KABATECK BROWN KELLNER LLP
BRIAN S. KABATECK
RICHARD L. KELLNER
ALFREDO TORRIJOS

21 By 
22 Alfredo Torrijos
23 Attorneys for Plaintiffs JACKIE BLENNIS and DAVID
24 BRICKNER

1
2 DATED: February 6, 2008

GIBSON, DUNN & CRUTCHER LLP
PETER SULLIVAN
SAMUEL G. LIVERSIDGE
MICHAEL H. DORE


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5
6 By: 

Michael H. Dore

7 Attorneys for Defendant HEWLETT-PACKARD
8 COMPANY

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10 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

11 Dated: 2/7/08, 2008

12
13 
14 The Hon. Jeremy Fogel
United States District Judge

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1 **DECLARATION OF MICHAEL H. DORE**

2 I, Michael H. Dore, declare as follows:

3 1. I am an attorney admitted to practice law before all courts of the State of California
4 and I intend to submit an application to become a member of the bar of this Court. I am an associate
5 in the law firm of Gibson, Dunn & Crutcher LLP, and I am one of the attorneys responsible for the
6 representation of Defendant Hewlett-Packard Company ("HP") in the action entitled *Jackie Blennis*
7 *and David Brickner, et al. v. Hewlett-Packard Company, et al.* (N.D. Cal. Case No. C 07-00333-
8 RMW). Pursuant to Local Rule 6-2(a), I submit this declaration in support of the parties' Joint
9 Stipulation and [Proposed] Order Continuing Deadline to Hold ADR Session (the "Joint
10 Stipulation"). Unless otherwise stated, the following facts are within my personal knowledge and, if
11 called and sworn as a witness, I could and would testify competently thereto.

12 2. The Reasons for the Requested Enlargement or Shortening of Time (Local Rule 6-
13 2(a)(1)). I believe that in light of the procedural posture of this case and related cases pending in this
14 Court in which HP is a defendant, efficiency would best be served by extending the deadline for the
15 parties to hold their ADR session.

16 3. Prior Time Modifications in this Case (Local Rule 6-2(a)(2)). The parties twice have
17 requested that the date of the case management conference be continued while HP's motion to
18 dismiss was pending. Those requests have been granted. The case management conference now is
19 scheduled for March 14, 2008.

20 4. Effect of the Requested Time Modification on the Schedule for the Case (Local
21 Rule 6-2(a)(3)). The requested extension of time to hold an ADR session would change the deadline
22 from February 16, 2008 until May 16, 2008.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 DATED: February 12, 2008

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27 MICHAEL H. DORE

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